

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

-against-

17 Cr. 00475(WFK)

DILSHOD KHUSANOV,

NOTICE OF MOTION

Defendant.

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PLEASE TAKE NOTICE, that upon the accompanying Declaration of Richard W. Levitt, Esq. and the accompanying Memorandum of Law with exhibits thereto, both dated October 18, 2019, and all other papers and proceedings heretofore had in the above-captioned action, the undersigned will move before this Court at a date and time convenient to the Court, for Orders,

1. Suppressing Mr. Khusanov's oral and electronic communications or granting alternative relief, including disclosure;
2. Vacating the protective order in *United States v. Kilkhayot Kasimov*, 15-cr-95 (WFK), to permit counsel for Kasimov to share their 3500 material with Mr. Khusanov's counsel;
3. Ordering the declassification of discovery presently in the SCIF or permitting its review by Mr. Khusanov;
4. Declassifying the defense translator's memorandum summarizing certain FISA surveillance, permitting review by Mr. Khusanov;
5. Requiring the government to provide additional *Brady* discovery;
6. Requiring the timely disclosure to permit an orderly trial of: witness and exhibit lists, expert notice, 404(b) and 3500 material; and

and for such other and further relief as the Court deems just and proper.

Dated: October 18, 2019
New York, NY

Yours, etc.,



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